

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MIKE HUCKABEE, RELEVATE GROUP,
DAVID KINNAMAN, TSH OXENREIDER,
LYSA TERKEURST, and JOHN BLASE *on
behalf of themselves and all others similarly
situated,*

Plaintiffs,

v.

META PLATFORMS, INC., BLOOMBERG
L.P., BLOOMBERG FINANCE, L.P.,
MICROSOFT CORPORATION, and
ELEUTHERAI INSTITUTE,

Defendants.

Case No. 1:23-cv-09152-LGS

Hon. Lorna G. Schofield

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Bobby A. Ghajar, hereby move this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Meta Platforms, Inc. in the above-captioned action at a date and time to be determined by the Court. Counsel for Plaintiffs consents to this motion by Defendant Meta Platforms' counsel.

I am in good standing of the bar of the state of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3.

Dated: December 4, 2023
Santa Monica, California

Respectfully submitted,

/s/ Bobby A. Ghajar

Bobby A. Ghajar

COOLEY LLP
1333 2nd St., Suite 400
Santa Monica, CA 90401
T: (310) 883-6400
F: (310) 883-6500
bghajar@cooley.com

Counsel for Defendant Meta Platforms, Inc.